

# **Exhibit C**

**From:** [Vonderhaar, Douglas](#)  
**To:** [Brian Murphy](#); [Jonathan Misny](#)  
**Cc:** [McClellan, Rand L.](#); [Johnston, Katherine R.](#)  
**Subject:** RE: Southard -- Settlement Communication  
**Date:** Tuesday, February 25, 2020 4:55:30 PM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.jpg](#)  
[Southard\\_001480 - 001561.zip](#)  
[BH ID by Bates\\_Southard\\_001480 - 001561.xlsx](#)  
[BH Data Aggregation -- Exact Consent Data.xlsx](#)  
[BH Data Aggregation -- Broadside Consent Data.xlsx](#)

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SETTLEMENT COMMUNICATION PURSUANT TO FRE 408

Brian & Jonathan:

Attached, please find documents and EBR/consent data indicating a potential defense(s) for the calls in the BH Data Aggregation produced on February 7, 2020. This information is a combination of Southard's records (electronic and hardcopy) and data from third-party vendors. We gathered this information during a preliminary search of Southard's records. As indicated in our letter, this information is not meant to be comprehensive.

1. **Southard\_001480 – 001561** – This zip file contains records evidencing a potential defense for the calls in the Data Aggregation (e.g., online submission forms, completed sweepstakes and window evaluation forms, etc.).
2. **BH ID by Bates\_Southard\_001480 – 001561** – This table will allow you to cross-reference a record in the above production with the relevant BH ID number in the Data Aggregation.
3. **BH Data Aggregation -- Exact Consent Data** – This spreadsheet contains the most readily available EBR/consent data for phone numbers in the Data Aggregation from Exact Customer (tab 1) and Exact Customer's partners (tab 2).
4. **BH Data Aggregation -- Broadside Consent Data** – This spreadsheet contains the most readily available EBR/consent data for phone numbers in the Data Aggregation from Broadside Media.

Please let me know if you have any questions.

Best,  
Doug

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**From:** Vonderhaar, Douglas  
**Sent:** Friday, February 7, 2020 4:31 PM

**To:** Brian Murphy <murphy@mmmb.com>; 'Jonathan Misny' <misny@mmmb.com>

**Cc:** McClellan, Rand L. <rmcclellan@bakerlaw.com>; Johnston, Katherine R.

<kjohnston@bakerlaw.com>

**Subject:** Southard -- Settlement Communication

Brian & Jonathan:

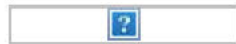
Attached, please find correspondence concerning the sample data that Brian and Rand discussed previously. We are preparing additional relevant information, which we expect to send to you next week.

Best,

Doug

**Doug Vonderhaar**

Associate



200 Civic Center Drive | Suite 1200

Columbus, OH 43215-4138

T +1.614.462.2634

[dvonderhaar@bakerlaw.com](mailto:dvonderhaar@bakerlaw.com)

[bakerlaw.com](http://bakerlaw.com)

